

Document Page 1 of 1
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA

In re:	:	BANKRUPTCY CASE
	:	
PEDRO JOSE BURGOS	:	NO. 11-41301 JTL
	:	
Debtor	:	Chapter 7 Proceeding

**TRUSTEE'S OBJECTION TO MOTION FOR RELIEF FROM STAY OF
WELLS FARGO BANK, N.A.**

COMES NOW Walter W. Kelley, the Chapter 7 Trustee, and files this objection to the Motion for Relief from Stay of Movant, Wells Fargo Bank, N.A.

A hearing on the Movant's motion is scheduled for August 8, 2012. The 341(a) hearing will not take place until August 16, 2012. It is necessary and appropriate that the Trustee have the opportunity to examine the debtor about the property that is the subject of Movant's motion before stay relief is granted.

WHEREFORE, the Trustee prays that the Court deny the Motion for Relief from Stay proposed by the Movant in the above-referenced case.

/s/ David S. Ballard
DAVID S. BALLARD
Attorney for Trustee
GA Bar No. 635107
Post Office Box 70879
Albany, Georgia 31708
(229) 888-9128
dballard@kelleylovett.com

CERTIFICATE OF SERVICE

I hereby certify that the following parties have been served with the Trustee's Objection. Those not served by electronic means by the court's electronic filing system have been served by First Class U. S. Mail or by e-mail at address indicated, this, the 19th day of July, 2012

MR. PEDRO JOSE BURGOS
3115 MERCURY DRIVE
COLUMBUS, GA 31906

ELIZABETH A. HARDY, ESQ.
U. S. TRUSTEE'S OFFICE
ustp.region21.mc.ecf@usdoj.gov

BRANDI R. LESESNE, ESQ.
ATTORNEY FOR MOVANT
JOHNSON & FREEDMAN, LLC
1587 NORTHEAST EXPRESSWAY
ATLANTA, GA 30329
brlesesne@jfflegal.com

/s/ David S. Ballard
DAVID S. BALLARD